

IN THE COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL DISTRICT OF EDMONTON

BETWEEN:

HER MAJESTY THE QUEEN

- and -

TRAVIS BRANDON BAUMGARTNER

Accused

AGREED STATEMENT OF FACTS

The Accused has pleaded guilty to charges that he:

COUNT 1: On or about the 15th day of June, 2012, at or near Edmonton, Alberta, did unlawfully cause the death of Brian Ilesic, thereby committing second degree murder, contrary to Section 235(1) of the *Criminal Code of Canada*;

COUNT 2: On or about the 15th day of June, 2012, at or near Edmonton, Alberta, did unlawfully cause the death of Edgardo Rejano, thereby committing first degree murder, contrary to Section 235(1) of the *Criminal Code of Canada*;

COUNT 3: On or about the 15th day of June, 2012, at or near Edmonton, Alberta, did unlawfully cause the death of Michelle Shegelski, thereby committing second degree murder, contrary to Section 235(1) of the *Criminal Code of Canada*;

COUNT 4: On or about the 15th day of June, 2012, at or near Edmonton, Alberta, did unlawfully attempt to murder Matthew Schuman, while using a firearm, contrary to Section 239(a) of the *Criminal Code of Canada*.

1. G4S Cash Solutions (Canada) Ltd ("G4S") is a multinational corporation providing security services, including armoured car services, in more than 125 countries. Part of the armoured car services includes cash replenishment in Automated Teller Machines ("ATM's"). G4S has over 657,000 employees worldwide.
2. At the time of the described events the Accused, Travis Brandon BAUMGARTNER, D.O.B. May 16, 1991 ("Accused") was an armored car security guard for G4S.

3. Brian ILESIC, D.O.B, September 16, 1976 ("Brian"), Edgardo REJANO, D.O.B. November 30, 1972 ("Eddie"), Michelle SHEGELSKI, D.O.B. June 29, 1985 ("Michelle") and Matthew SCHUMAN, D.O.B. December 4, 1986 ("Matthew") were also G4S guards who worked with the Accused regularly.
4. Matthew worked at G4S on a casual basis as he was a firefighter with the military. He had gone to the same G4S training course as Eddie and the Accused. Their shift on June 14, 2012, was Matthew's third day employed by G4S and his first training shift. He had just been issued his revolver that day.
5. Michelle had been employed with G4S for approximately 4 years and held the positions of trainer and custodian. Brian had been employed with G4S for approximately 6 months and was being trained for the position of custodian. Eddie had recently started with G4S being employed there for approximately 3 months.
6. The Accused had commenced his employment with G4S on April 12, 2012.
7. The Accused owed \$58,000 for his recently purchased Ford F150 truck. His mother, Sandra, co-signed for the loan. He owed at least two of his friends' money and was always getting his friends to pay for things. On June 14, 2012, the Accused had an account with TD Bank with a balance of 26 cents.
8. The Accused paid his mother rent to live in the basement of their home in Sherwood Park, Alberta. The money would be directly deposited once per month and Sandra was trying to get the Accused to change the deposits to twice per month. This led to an argument between them on the afternoon of June 14, 2012.
9. The argument got quite heated. The Accused told her not to worry - she would get her money. Sandra described the Accused as a "different person" that night and "he was so cold". The argument concluded with the Accused telling his mother "it doesn't even matter, I'm not coming home so don't worry about it, you'll get your money". Sandra started crying and went into her bedroom as the Accused left for his shift at G4S at approximately 1800 hours.

10. The Accused reported to the G4S worksite located at 9373-47 Street, Edmonton, Alberta, and parked his truck, a Ford F150, outside of the employee parking lot. This was not unusual for him as he preferred the more secluded location to prevent any other employees from damaging his vehicle.
11. The Accused was assigned to work that evening with Brian, Eddie, Michelle and Matthew on a routine circuit replenishing money in ATM's throughout Edmonton. The crew was normally 4 people however this was a training run with Michelle training the Accused, Matthew and Brian. The Accused and Brian were in the armoured truck; Eddie was driving. They were being followed by Michelle and Matthew in the van. All of the G4S employees were in uniform and were armed with .38 calibre 6-shot revolvers as well as 2 speedloaders on their belt. Speedloaders contain 6 bullets so that all can be loaded into the handgun at once. Each member had 18 rounds of ammunition in total. The ammunition was "hollow-point". A hollow-point bullet is an expanding bullet that has a pit or hollowed out shape in its tip, often intended to cause the bullet to expand upon entering a target in order to decrease penetration and maximize tissue damage and blood loss or shock.
12. During the course of the early evening the Accused was texting his friend Dylan. Dylan had known the Accused since they were in grade 7 together. The Accused was joking about robbing G4S and said something along the line of "this is the night". The Accused had mentioned robbing G4S before, but always said it jokingly. That is the reason Dylan did not react to it.
13. The Accused made a number of comments on Facebook, an Internet social media website, over the previous three months:
 - a. April 19, 2012 "2 days till training....I get a gun ;)".
 - b. May 2, 2012 "100% shooting test, I'm a god".
 - c. May 10, 2012 "I had a dream where I went back to haythorne and beat the shit out of anybody that made fun of me in the past. I love my mind".

- d. June 1, 2012 “I wonder if I’d make the six o’clock news if I just started popping/*sic*/ people off.”
 - e. June 9, 2012, the Accused changed his profile picture showing him wearing a vest, a balaclava and sunglasses looking down.
14. The five G4S members headed out and made two stops prior to their stop at HUB Mall. HUB Mall is a combined shopping mall and student residence located at the University of Alberta. It measures four city blocks in length running north to south. Shortly after midnight on June 15, 2012 the Accused and his 4 co-workers arrived at the north end of HUB Mall. Eddie drove into the turnaround area which was covered and parked the truck; Michelle parked the van on the east side of the turnaround.
15. They were there to deposit money into two ATM’s located on the second floor of HUB Mall. The Accused, Brian, Michelle and Matthew all entered the mall and walked up two flights of stairs. Eddie remained outside with the armoured car. The distance from the exterior door of the TD ATM vestibule to the exterior entrance door to stairwell #9203 is 10 meters. The distance from the interior of that door down the stairs to the door at the bottom is approximately 14 meters.
16. The Accused, Brian, Michelle and Matthew entered the small secure vestibule providing access to the ATM. The vestibule is secured by a steel door which locks automatically when it is closed. The door cannot be accessed from the outside without a key. Brian was in possession of the key at all times. Brian and Matthew were at the ATM, kneeling or crouched, preparing to put in the money. Michelle was standing behind them observing and supervising. The Accused was standing at the doorway. With the door closed and secured, while the three guards were facing away from the Accused concentrating on their jobs, the Accused removed his G4S-issued .38 calibre handgun from its holster. He shot Matthew in the left side of his head at point-blank range. He then shot Michelle in her head, also at point-blank range, killing her instantly. Then he shot Brian twice in his head, also at point-blank range, killing him instantly.

17. The Accused had shot all 6 bullets from his gun. Police later identified two holes in the vestibule consistent with fired projectiles. The Accused had fired the two shots through the wall of dorm adjacent to the ATM vestibule, with one striking the bathtub. The Accused then left the ATM vestibule, shutting the door leaving Brian, Michelle and Matthew locked inside. Even if he had wanted to do so, the Accused could not have re-entered the vestibule since the key was locked inside.
18. The Accused proceeded quickly through HUB Mall back towards the armoured car. One of the students in HUB Mall described him as "running away". When the Accused reached the bottom of the stairs he removed one speed loader from his belt and reloaded the handgun. He exited the mall and moved towards the armoured car approaching Eddie. The Accused faced him and shot Eddie underneath his right eye, he then shot him twice in the back of the head, killing him. The Accused left Eddie laying face down in a pool of blood on the paved roadway as he entered the driver's seat of the armoured car and drove away.
19. Several members of the public called 9-1-1 stating they had heard shots fired at HUB Mall. The initial call was received at 0012 hours. Two Safewalk members (volunteers who will accompany people who do not wish to walk around the University alone), Ashley and Safira, were in HUB Mall approximately half way down near the Rutherford library when they heard a "thud". They reached the TD ATM and heard moaning and saw what appeared to be blood coming from underneath the door. Students and staff in the HUB Mall heard Matthew's cries for help and called police. Safira led the responding Edmonton Police Service ("EPS") members to the ATM vestibule. It was securely locked. Since the door opened outward, it was impossible to batter down.
20. S/Sgt Johnson took a battering ram out of the trunk of his police vehicle and he went upstairs with Cst. Dowhaniuk and Safira. He immediately noticed blood seeping under the door and heard a male screaming incoherently. He attempted to open the door but it was locked. Cst. Dowhaniuk went back downstairs to get additional tools to try and unlock the door. S/Sgt Johnson attempted to speak with the male inside who just kept yelling "help me" in a slurred voice. Many of his other words spoken

- were incomprehensible. There was a metal ventilation screen at the bottom of the door which S/Sgt. Johnson punched out with the ram. He then was able to look inside and see 3 bodies. Cst. Dowhaniuk returned with a pick axe, sledge hammer and bolt cutters. A total of 7 EPS members then attempted to gain entry into the vestibule.
21. They started to breach the door with the pick axe and the ram to break the door handle. With the pick axe and bolt cutters they eventually were able to pry the door outward. They estimated it took 1-2 minutes to gain entry.
 22. Police formed a rapid deployment entry team (first responders who act without assistance of the tactical unit due to exigent circumstances) and entered the vestibule. Once inside they saw the two deceased victims, Brian and Michelle, and Matthew. All were in full G4S uniform and still had their firearms secured in their holsters. There was a significant amount of blood on the floor around them in this very small room. Matthew had a chunk of his skull missing and his brain was exposed. EPS members cleared the room of threats and pulled Matthew, Michelle and Brian out of the vestibule.
 23. Cst. Dack and Cst. Li stayed with Matthew who had no recollection of the incident but was able to identify himself by his first name. Cst. Dack provided gentle and direct pressure to the head wound and continued to talk to Matthew trying to provide comfort. Matthew made several statements that he was "done for" and begged the officer to help him and hurry up. Because of Matthew's profoundly delicate condition, the EPS members and paramedics were unable to take him down the narrow set of stairs closest to the ATM vestibule. They had to carry him on a stretcher down the length of HUB Mall to the other set of stairs, not knowing who the suspect was and where he was.
 24. Once they managed to get him outside, Matthew was taken by ambulance to the University of Alberta Hospital Emergency Department where he underwent a CT Scan and emergency surgery from 0230 to 0600 hours. The surgeons retrieved one bullet from Matthew's head.

25. The Accused ultimately made his way back to the G4S worksite and parked the armoured car next to his own truck. He moved three packages of cash from the armoured car into his vehicle. The amount was initially estimated to be \$360,000. He left the rest of the cash in the armoured car and he drove away. This was all recorded by a private video surveillance camera.
26. The Accused stopped at the residences of two of his friends in Sherwood Park and, without them knowing he was doing so, he left them money. After hearing the news reports in the media, both friends notified police and returned all of the money. While at one of his friends the Accused destroyed his cell phone so that it could not be used to track him.
27. The Accused returned to his mother's residence in Sherwood Park, where he changed his clothes, and left his G4S uniform and boots at the house. He left a large bundle of cash on his mother's kitchen table and left. The money was estimated to be approximately \$64,000. His mother discovered the money the next morning and she notified police of her discovery and they seized the money. They also seized the Accused's boots and pants noting obvious blood spatter on his boots. The DNA analysis of these exhibits showed conclusively that the blood was that of Michelle and Eddie. The Accused swapped the license plates between his truck and his mother's vehicle. He then left with his truck and the remainder of the stolen money.
28. Members of the EPS along with RCMP in Edmonton, Sherwood Park, Langley, B.C., Canadian Border Security Agency, and U.S. Homeland Security participated in the investigation and efforts to apprehend the Accused. They determined the Accused was the suspect and issued a Canada wide warrant for his arrest.
29. The Accused proceeded south west in his truck. At or near Banff, Alberta he discarded his G4S firearm and vest in a river. He proceeded to the United States Border Station at the Port of Lyndon, Washington located near Langley.
30. At 1508 hours, the Accused approached the booth at the border crossing. As the vehicle passed the license plate reader the "Armed and Dangerous" alert sounded from the computer. The Accused was arrested by U.S. authorities. He had no

passport on his person. The border guards located several large bundles of Canadian currency in a black backpack in the truck as well as bundles scattered throughout the truck. It totaled \$333, 580.

31. The Accused said to the border guards that he didn't remember anything for the last 3-4 days, and that he was snatched and had a gun put in his face by a guy who told him to drive to Seattle and deliver the back pack to him or he would kill his family.
32. At approximately 2218 hours, the Accused was taken to the Aldergrove, B.C. border crossing. He was told of his *Charter* rights and provided access to legal counsel. He was then returned to his cell.
33. At 1025 hours the next day he was removed from the cell for initial questioning by EPS Homicide Detective Scott Jones ("Det. Jones"). The Accused indicated that his name was "David Webb" and he claimed to have memory issues in relation to recent events. The Accused was then returned to a holding cell on his own and then at 1348 hours he was placed in the same cell as an undercover RCMP police officer ("UC officer"). The UC officer was portraying an experienced inmate.
34. The interaction between the UC officer and the Accused was both audio and video recorded. They talked about general issues and at one point the Accused stated he didn't remember anything and they had been calling him Travis, but his name was "David Webb". He told the UC officer that he had been told he killed three people also stating that he didn't remember anything from the last 5 days and barely remembered anything about his life.
35. "David Webb" is the real name of the fictional character *Jason Bourne*, the protagonist of a series of novels by Robert Ludlum and subsequent film adaptations. Jason Bourne's character is that of a covert assassin. On a job in France he was shot in the back and awakens with his memory gone.
36. The Accused was removed from the cell at 1448 hours to go speak with Det. Jones. The Accused was adamant he was "David Webb" and continued to tell Det. Jones that he did not remember anything. He said he last remembered being in a truck in a sleeping bag on a pillow and being woken up by a man. He provided a description of

this man having short blonde hair, brown eyes and a tribal tattoo on his face. He claimed the man had a gun to the Accused's face and said "he was always watching my mom and was going to kill her if I did not deliver his money". He was to drive to Seattle and somehow this man would find him, despite the fact the Accused no longer had a phone. He then told Det. Jones "I'm just trying to help my mom sir".

37. Det. Jones left the room at 1627 hours and returned at 1643 hours. Upon his return, the Accused told Det. Jones, "I just can't believe I would do something like that". He recalled going to work that night around 6:30. Det. Jones asked "were you mad when you got there?" to which the Accused replied "I think so...just mad at the world I guess". He said everyone at G4S teased him. He described G4S Management as uncaring. He was mad at work and was further aggravated by problems they experienced that night with their initial armoured truck. He recalled having two stops prior to HUB Mall. He said "Did our first two stops, I remember still being very angry."
38. At 1651 hours the Accused admitted to Det. Jones that he shot his three co-workers and Eddie who was outside the truck. He didn't recall any reasoning to the order in which he shot them. He stated, "I think I was just mad at everybody". He admitted that when he shot at each of them he was aiming for their heads. After he shot Eddie he got in the truck and drove ending up at G4S. He drove to his house and grabbed some things and left money for his mom. He went to his first friend's house, leaving him money and then to the second's. He felt he owed his second friend money for all that he had "forked out" for him during the years. He said he didn't get along with anybody at work, everybody always made fun of him and he kept to himself. He described what he did as "a blind rage". He put the vest in water in a different place from the gun. He said they would be long down the river by now, probably in the ocean. No one will get it - "he made sure of that".
39. During the interview the Accused would become emotional, placing his hands on his face and crying.
40. Near the conclusion of the interview, the Accused wrote a letter to the victims' expressing regret for his actions.

41. The Accused was returned to the same holding cell with the UC officer at 1805 hours. The conversation between the two was again video and audio recorded. The Accused sat down on his bunk and immediately stated, "I did it all". Without prompting he admitted to having "killed those people and robbed their truck." During the course of their lengthy discourse, the Accused discussed the circumstances of the offence and that the evidence they had against him was undeniable. He told the officer "Yeah. Just fuckin' shot three people...actually four people. Put the money in my truck and drove away...got rid of all the evidence. Threw the gun away".
42. He told the UC officer it was a .38 and "point-blank range too". The officer remarked, "the jump on four at point-blank?". The Accused replied, "Yeah". The officer said, "You must be fast". The Accused chuckled and responded, "I guess I am".
43. The conversation lasted from 1805 to 1942 hours. Throughout the conversation the Accused was very relaxed with the UC officer. He was very matter of fact in the way he spoke and sometimes would sigh and chuckle.
44. The conversation continued about prison and what it was like then the Accused changed the subject and the following conversation ensued:

ACCUSED: Yeah, I was using hollow points too, so it just (popping sound effect), brains are mush.

OFFICER: Yeah, fuck.

ACCUSED: They go in, and they don't come out.

OFFICER: All it takes is one, eh?

ACCUSED: Well, apparently not, because the fourth guy.

OFFICER: Yeah, well fuck, the guy must have had a fuckin' head of steel.

ACCUSED: Yeah. I remember, the last guy took three shots.

OFFICER: Three?

ACCUSED: Yeah.

OFFICER: Three to go down? Jesus. He's strong, eh.

ACCUSED: Yeah. (Breathes) Don't think about it, it's over and done with now.

The conversation continued:

ACCUSED: I was really pissed when I fired that first shot, my hearing was...

OFFICER: Hearing, went?

ACCUSED: I couldn't hear anything, 'cause the gu-, gun was so loud. Fuck.

OFFICER: You didn't even hear the other ones, you just see it.

ACCUSED: Yeah. 'Cause like that ringing you hear in, anything, any kind of movie or games-

OFFICER: Yeah.

ACCUSED: exactly I heard.

OFFICER: .. too loud.

ACCUSED: It's fucked up.

OFFICER: Didn't see it comin'.

ACCUSED: Nope none of em.

OFFICER: How the fuck..... with guns.

ACCUSED: They couldn't draw it fast enough.

OFFICER: No skills.

ACCUSED: And literally, probably three shots within a matter of two seconds.

OFFICER: Fuck, that's fast.

ACCUSED: Yeah, it was crazy.

ACCUSED: Fuckin', the mafia would have been impressed.

OFFICER: Pft, no shit. Fuckin' professional.

45. The Accused said the detective told him he was too slick for his own good. The UC officer noted that there were no cameras and the keys were in the ignition. The Accused responded, "You just gotta think about what you're doin'. Plan ahead." The UC responded that it was something to be able to "take down four as one" and that "the plan must have been decent enough." The Accused replied, "True enough." The Accused also told the UC officer how he got rid of his phone because he did not want them tracing him so he smashed it to pieces.

46. At one point in the discussion with the undercover officer the Accused was discussing his financial situation:

ACCUSED: No, I wished they wouldn't have been there, so I didn't have to do that.
OFFICER: You just go alone?

ACCUSED: No, well, you have to have a crew. But I just wished that I didn't have to do that.

OFFICER: Strapped for cash, eh?

ACCUSED: Twenty-one years old and sixty grand in debt already, man, what the fuck am I gonna do?

OFFICER: Sometimes you gotta do somethin'.

ACCUSED: Take the initiative.

OFFICER: Yeah, grab the bull by the fuckin' horns.

ACCUSED: That's what I did. It just didn't end up very well. At least I don't have to pay for the truck anymore.

OFFICER: No. I would say you don't have to worry about that fuckin' bill.

ACCUSED: No, no bills for me.

...

OFFICER: Yeah, might save you some, would have saved you some headaches if you could have just, you know, grabbed it beforehand, I guess.

ACCUSED: Oh, yeah. It would have saved me a lot of headaches. But (sighs) what could I do?

OFFICER: Um-hm.

ACCUSED: An opportunity. There we go.

47. All but approximately \$1400 of the cash stolen from G4S has been recovered.
48. Dr. Bernard Bannach, Medical Examiner, conducted autopsies on Eddie on June 18, 2012 and Brian and Michelle on June 19, 2012.
49. In relation to Eddie, Dr. Bannach reported the following: Eddie died as a result of multiple gunshot wounds of the head. There were three gunshot wounds to the head associated with skull and facial fractures and penetration of the brain and brainstem by multiple bone fragments. Two of the wounds were through and through and the third is associated with recovery of multiple bullet fragments from the head during autopsy. The first gunshot wound entered below the right eye with exit wound in right ear region associated with facial fractures on the right. There was stippling present on the face in association with this gunshot wound. This is present on the left cheek and forehead region as well as the left side of the nose and the tip of the nose. The second entrance gunshot wound was at the back of the head with fracturing of the skull on the left and an exit gunshot wound behind the left ear. The third gunshot wound entered at the back of his head with bullet fragments and core recovered and associated skull fractures and penetration of brain and brainstem by multiple bone fragments.
50. In relation to Michelle, Dr. Bannach reported the following: Michelle died as a result of a gunshot wound to the head. The gunshot wound entered above the left ear on the parietal scalp. There was penetration of the right and left cerebral hemispheres and an exit wound in the right parietal scalp above and slightly in front of the right ear
51. In relation to Brian, Dr. Bannach reported the following: Brian died as a result of a gunshot wound to the head. There were two gunshot wounds; one is described as a superficial through and through wound of the back of the neck involving the skin and the immediate subcutaneous tissues only. The fatal gunshot wound entered his head above the left ear (left parietal bone) and penetrated the left side of the brain,

transecting the brainstem, exiting the base of the brain and the skull base resulting in multiple radiating skull fractures.

52. Matthew SCHUMAN is recovering from his gunshot wound to the head. He is able to walk, talk, comprehend, and express himself. His prognosis is unknown though he will always suffer memory issues. He was in the Glenrose Rehabilitation Clinic for three months. He continues to experience a variety of difficulties including problems with meningitis and infection in his brain from the shrapnel. The brain injury has left him with a reading and writing deficit.
53. Matthew was interviewed on July 5, 2012 and recalled a portion of the evening when he was shot. He recalled being on a training night and remembered being with Eddie and the Accused as they had gone to training together. He just got his pistol that day. He recalled a female trainer, but was unable to recall her name. He wasn't sure if it was their first stop or not but he remembered hearing what "I thought was shooting but it was the police breaking the door down trying to get me out...I thought I was getting shot again". There were so many of them for the training and he recalls a really small room. He recalled crying and screaming and the police identifying themselves and breaking the door open.

ALL OF WHICH IS ADMITTED AS FACT.

DATED THIS _____ DAY OF AUGUST, 2013 AT THE CITY OF EDMONTON IN
THE PROVINCE OF ALBERTA.

Steven M. Bilodeau, Q.C.
Agent for the Attorney General of Alberta

Peter J. Royal, Q.C.
Counsel for the Accused

Tania E. Holland
Agent for the Attorney General of Alberta

Travis Brandon Baumgartner

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JUDICIAL DISTRICT OF EDMONTON

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TRAVIS BRANDON BAUMGARTNER

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AGREED STATEMENT OF FACTS

Alberta Crown Prosecution Service
Edmonton Prosecutions Branch
6th Floor, 10365 – 97 Street
Edmonton, Alberta
T5J 3W7

Steven M. Bilodeau, Q.C.
Tania Holland
Agents of the Attorney General of Alberta

Royal Teskey
#200, 9636 - 102A Avenue
Edmonton, Alberta
T5H 0G5

Peter J. Royal, Q.C.
Counsel for the Accused